

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GENTEX CORPORATION, a Delaware
Corporation,

Plaintiff,

v.

GALVION LTD., a Delaware
corporation; and GALVION, INC., a
Canadian company,

Defendants.

Case No. 1:19-cv-00921-MN

**STIPULATION TO
SUBSTITUTE EXPERT**

This stipulation is made by and between Plaintiff Gentex Corporation (“Gentex”) and Defendants Galvion Ltd. and Galvion, Inc. (collectively, “Galvion” or “Defendants”) to substitute Gentex’s Quebec Law Expert—Justice Azimuddin Hussain—with Mr. Bob Sotiriadis.

WHEREAS, Gentex retained Justice Hussain as its expert on Quebec law, and Justice Hussain submitted three expert reports on September 24, 2021; October 20, 2021; and November 12, 2021; and was deposed on November 30, 2021;

WHEREAS, pursuant to the Scheduling Order (D.I. 134), expert discovery closed on December 17, 2021;

WHEREAS, Gentex represents that, on December 20, 2021, Justice Hussain was appointed Judge of the Superior Court of Québec for the district of Montréal, and that his appointment was effective immediately and required him to immediately cease all work as an expert in the above pending matter;

WHEREAS, Gentex represents that the appointment process is confidential such that Gentex had no advance notice of Justice Hussain’s appointment, or that it was even a possibility,

and that Justice Hussain also had no advance notice of his appointment to the bench;

WHEREAS, Gentex notified Galvion on January 5, 2022 that it had narrowed its search for a replacement expert to two experts, including Mr. Bob Sotiriadis, and requested permission to place Mr. Sotiriadis under the parties' Protective Order, which Galvion consented to on January 7, 2022;

WHEREAS, on January 28, 2022, Gentex served a report by Mr. Sotiriadis adopting and commenting on Justice Hussain's opinions;

WHEREAS, on February 17, 2022, Gentex served Mr. Sotiriadis' errata to Justice Hussain's prior deposition testimony;

WHEREAS, Mr. Sotiriadis agreed to adopt Justice Hussain's prior deposition testimony subject to the errata Gentex served on February 17, 2022;

WHEREAS, the parties seek to allow Gentex to substitute its previous Quebec Law Expert Justice Hussain with Mr. Sotiriadis without imparting undue prejudice on Galvion;

NOW THEREFORE, the Parties stipulate and agree, subject to the approval of the Court, that:

1. Gentex will substitute its previous Quebec Law Expert Justice Hussain with Mr. Sotiriadis;
2. Galvion has not waived its right to object to any alleged new opinions in Mr. Sotiriadis's February 17, 2022 errata;
3. The parties shall refer to any previous expert reports or deposition testimony from Justice Hussain as Mr. Sotiriadis' expert reports and deposition testimony, respectively, unless otherwise required by this Stipulation;
4. Galvion may depose Mr. Sotiriadis for up to two (2) hours; the deposition will be

limited to Mr. Sotiriadis' personal background, his January 28, 2022 expert report, and his errata served on February 17, 2022; and Galvion may refer to Justice Hussain's previous expert reports, deposition testimony, and/or related exhibits for context during Mr. Sotiriadis' deposition.

/s/ Amy M. Dudash

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Dated: February 22, 2022

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SO ORDERED this ____ day of _____, 2022

United States District Judge